



NZACAP

New Zealand Association
of Child and Adolescent Psychotherapists Inc.

Jacquelyn Manley
Registrar PBANZ
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Dear Jacquelyn

Thank you so much for your timely and considered letter. As the executive of NZACAP we have discussed your response and have some further concerns which we would appreciate the board considering. As you said in your response,

"The Board's role is to protect the health and safety of members of the public by providing for mechanisms to ensure that psychotherapists are competent and fit to practise. If it is discovered that the Board policies and standards are not working in the public's interest then these will be reviewed."

We are concerned that the way the current policies and practises stand there may not be adequate protection for children who see a Psychotherapist registered under the General Scope of Practise. We have also had concerns from Child Psychotherapy Supervisors who are supervising psychotherapists who work under the general scope. We remain concerned that there are some psychotherapists who appear to be operating outside of their scope of practice and apart from complaints and reliance on self-report, there doesn't appear to be an effective mechanism for preventing concerning practice.

We would like to suggest that:

- PBANZ consider adding to the registration process and the practising certificate an area where the Psychotherapist can indicate the client groups worked with. This would give PBANZ the opportunity to capture the number of Psychotherapists working with vulnerable client groups under the General Scope.
- This would offer PBANZ the opportunity to more accurately ascertain whether the supervision received by a Psychotherapist is appropriate to the client groups the Psychotherapist is working with and to monitor on a yearly basis the changes in client groups being worked with.

Thank you for your consideration

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